



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

SK
F. #2016R02228

*271 Cadman Plaza East
Brooklyn, New York 11201*

October 19, 2020

By Email and ECF

Andrew J. Frisch
Schlam Stone & Dolan LLP
26 Broadway
New York, NY 10004

Re: United States v. Aleksandr Zhukov
Criminal Docket No. 18-633 (S-1) (EK)

Dear Mr. Frisch:

The government provides supplemental discovery in accordance with Rule 16 of the Federal Rules of Criminal Procedure and additional pretrial disclosures.

The government previously disclosed information about a “git” related to the defendant’s schepme that had been posted online and provided you with a copy of the git and related files. See ECF No. 1, ¶¶ 38-39; ECF Nos. 133, 137. The government hereby provides notice that its expert, LL, may testify regarding the git and related files; logs exported from the “git” were previously produced to you as ZHU006825 to ZHU006828, and an analysis of the related files is enclosed as 3500-LL-6.

The government also hereby provides written notice that it intends to offer business records provided by LinkedIn via certification pursuant to Federal Rule of Evidence 902(11). That certification is enclosed.

Very truly yours,

SETH D. DUCHARME
Acting United States Attorney

By: /s/
 Saritha Komatireddy
 J. Artie McConnell
 Alexander F. Mindlin
 Assistant U.S. Attorneys
 (718) 254-7000

Enclosures

cc: Clerk of the Court (EK) (by ECF) (without enclosures)